

Exhibit A

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11 *[Additional Counsel Listed on Following Pages]*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 IN RE: UBER TECHNOLOGIES, INC.,
16 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

17 This Document Relates to:

18 ALL ACTIONS

17 **DECLARATION OF NIELS MELIUS IN**
18 **SUPPORT OF DEFENDANTS' JUNE 26,**
19 **2025 BRIEF IN SUPPORT OF**
20 **PRIVILEGE CLAIMS FOR**
21 **CLAWBACKS IN JUNE 5, 2025 LOG**

21 **DECLARATION OF NIELS MELIUS**

22 I, Niels Melius, having personal knowledge of the following state:

23 1. I am an attorney and Senior Counsel, Litigation, at Uber. I was first employed by Uber
24 in September 2021 and have worked as in-house legal counsel for nearly four years. In my role, I am
25 responsible for providing legal advice to Uber's leadership and employees, and I have managed teams
26 of attorneys, paralegals, and various non-legal professionals. I offer this Declaration in the above-
27

1 captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA,
2 LLC's June 26, 2025 Brief In Support of Privilege Claims for Clawbacks in the June 5, 2025 Privilege
3 Log. The facts set forth herein are true and correct and are based on my own personal knowledge, and
4 I could and would competently testify thereto if called.

5
6 2. As part of my current role, I help prepare company witnesses to testify at depositions
7 in litigation. My team and I assisted in preparing Catherine Gibbons, Uber's Senior Director, Global
8 Head of Platform Safety, Identity, Risk & Payments, for her deposition in the Boston Retirement
9 Systems litigation. As a result, I am familiar with the materials in-house attorneys generated and used
10 to prepare Ms. Gibbons for this deposition.

11 3. I have reviewed and am familiar with the documents identified in the privilege log as
12 JCCP_MDL_PRIVLOG043854, JCCP_MDL_PRIVLOG043859, JCCP_MDL_PRIVLOG104710,
13 JCCP_MDL_PRIVLOG104734, JCCP_MDL_PRIVLOG104743, JCCP_MDL_PRIVLOG104748,
14 JCCP_MDL_PRIVLOG043856, and JCCP_MDL_PRIVLOG104756. These eight documents were
15 compiled in a Google Drive folder by Uber in-house attorneys, and Uber non-attorney employees at
16 the direction of Uber in-house attorneys, in collaboration with Uber's outside defense counsel, A&O
17 Shearman, for the purpose of preparing Ms. Gibbons for her deposition in the Boston Retirement
18 Systems Litigation. A&O Shearman also placed these documents in a binder with tabs that was used
19 to prepare Ms. Gibbons for this deposition. As such, the file name of each document contains a
20 preparation binder tab number. Moreover, all eight documents contain highlighting made by attorneys
21 at A&O Shearman that reflects their mental impression or assessment of the importance of the
22 highlighted portion of each document.

23 4. I have reviewed and am familiar with the documents identified in the privilege log as
24

JCCP_MDL_PRIVLOG043850, JCCP_MDL_PRIVLOG104706, JCCP_MDL_PRIVLOG104721, JCCP_MDL_PRIVLOG104727. Uber in-house attorneys, and Uber non-attorney employees at the direction of Uber in-house attorneys, in collaboration with Uber's outside defense counsel, A&O Shearman, compiled these documents in a binder used to prepare Ms. Gibbons for her deposition in the Boston Retirement Systems Litigation. As such, the file name of each document contains a preparation binder tab number. Moreover, each document contains highlighting made by A&O Shearman attorneys that reflects their mental impression or assessment of the importance of the highlight portion of each document.

5. I have reviewed and am familiar with the documents identified in the privilege log as, JCCP_MDL_PRIVLOG104752, JCCP_MDL_PRIVLOG104758, JCCP_MDL_PRIVLOG104763, JCCP_MDL_PRIVLOG104778, JCCP_MDL_PRIVLOG104784, JCCP_MDL_PRIVLOG104794, JCCP_MDL_PRIVLOG104795, JCCP_MDL_PRIVLOG104814, JCCP_MDL_PRIVLOG104816. Uber in-house attorneys, and Uber non-attorney employees at the direction of Uber in-house attorneys, in collaboration with Uber's outside defense counsel, A&O Shearman, compiled these nine documents in a Google Drive folder, for the purpose of preparing Catherine Gibbons for her deposition in the Boston Retirement Systems Litigation. A&O Shearman attorneys placed these documents in a binder used to prepare Ms. Gibbons for that deposition. As such, the file name of each document contains a preparation binder tab number.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 26, 2025.

By: Niels Melius
Niels Melius